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RECEIVED
IND. DEFENSE LITIGATION

August 28, 2008

Delivered by Fax and Mail

Shneur Z. Nathan
City of Chicago, Dept. of Law
30 N. LaSalle St., Suite 1400
Chicago, IL 60602

Megan K. McGrath
City of Chicago, Dept. of Law
30 N. LaSalle St., Suite 1020
Chicago, IL 60602

Re: Graham v. Dolan, 08 C 889

Dear Counsel:

Regarding Timothy Graham, we did not list him on our Rule 26(a)(1) disclosures. We do not know his address.

Regarding LaTanya Carter, her nickname and possibly her middle name is Tierra. She was Jermaine Sipp's girlfriend at the time of the police raid.

Regarding U.S. Legal Support, I have spoken to them three times in the past week. I told them they should not just show up at my office, because I may not be there. I understand that they came by once. I will call them today, once again, to try to arrange, once again, a pick-up time for the photographs.

I understand from your phone message the other day that you have not served subpoenas on Bernita Williams or Timothy Sipp and, therefore, the depositions will not proceed on September 5, 2008. I have now booked other matters for that day.

Sincerely,



Irene K. Dymkar



August 22, 2008

City of Chicago
Richard M. Daley, Mayor

Department of Law

Mara S. Georges
Corporation Counsel

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SENT VIA U.S. MAIL AND FACSIMILE

Irene K. Dymkar
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Chicago, IL 60606

RE: Graham et al. v. Dolan, et. al., 08 C 889 - Rule 37 Letter

Ms. Dymkar:

Pursuant to Rule 37 of the Federal Rules of Procedure, we request that you provide complete responses to Defendant Cline's First Set of Interrogatories. Specifically, your clients' responses to Interrogatory No. 5 are deficient because they do not provide witness contact information as requested.

In your clients' written responses to Cline's Interrogatory No. 5 they each state that Timothy Sipp was present on the second floor before and after the alleged search of the second floor apartment located at 1136 N. Monticello in Chicago, Illinois on February 9, 2007. However, your clients provided no contact information as requested in subpart (a) for any witnesses.

In accordance with Rule 33, please provide contact information for Anthony Sipp, Tierra Carter, and "Jermaine Sipp's friend" as requested in Defendant Cline's Interrogatory No. 5. If your clients' deficient interrogatory responses are not cured before 2:00 p.m. on August 27, 2008, we will have no choice but to seek assistance from Judge Guzman.

Sincerely,

/s/ Le'Ora Tyree
Le'Ora Tyree

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/s/ Shenur Nathan
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